

OLIVER J. PANCHERI, ESQ.
Nevada Bar No. 7476
JESSICA M. LUJAN, ESQ.
Nevada Bar No. 14913
HOLLEY DRIGGS
300 South Fourth Street, Suite 1600
Las Vegas, Nevada 89101
Tel.: (702) 791-0308
Fax: (702) 791-1912
Email: opancheri@nevadafirm.com
jlujan@nevadafirm.com

ROBERT T. STEWART, ESQ.
Nevada Bar No. 13770
FOLEY & LARDNER LLP
95 South State Street, Suite 2500
Salt Lake City, UT 84111
Tel.: (801) 401-8900
Email: rtstewart@foley.com

JEAN-PAUL CIARDULLO, ESQ. (*pro hac*
vice)
California Bar No. 284170
FOLEY & LARDNER LLP
555 Flower Street, Suite 3300
Los Angeles, California 90071
Tel.: (213) 972-4500
Fax: (213) 486-0065
Email: jciardullo@foley.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PARADISE ENTERTAINMENT LIMITED, a
Bermuda corporation; and LT GAME
(CANADA) LIMITED, a Nevada corporation,

Plaintiffs,

v.

EMPIRE TECHNOLOGICAL GROUP
LIMITED, a Nevada corporation; GAMING
SPECIALIZED LOGISTICS LLC, a Nevada
limited liability company; LINYI FENG, an
individual; ROY KELCEY ALLISON, an
individual; and DARYN KIELY, an individual,

Defendants.

Case No. 2:24-cv-00428-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND PLAINTIFFS' DEADLINE
TO RESPOND TO DEFENDANTS'
FIRST AMENDED
COUNTERCLAIMS (ECF NO. 34)**

(FIRST REQUEST)

STIPULATION

Plaintiffs Paradise Entertainment Limited (“Paradise”) and LT Game (Canada) Limited (“LT Game”) (collectively, “Plaintiffs”) and Defendants Empire Technological Group Limited, Gaming Specialized Logistics LLC, Linyi Feng, Roy Kelcey Allison, and Daryn Kiely (collectively, “Defendants”, and collectively with Plaintiffs, the “Parties”), by and through their undersigned counsel of record, hereby stipulate and agree as follows:

1. On March 1, 2024, Plaintiffs filed their Complaint against Defendants (ECF No. 1);
2. On April 26, 2024, Defendants filed their Answer to Complaint and Counterclaims (“Counterclaims”) (ECF No. 17);
3. On June 7, 2024, Plaintiffs timely answered Defendants Counterclaims (ECF No. 29);
4. On June 28, 2024, Defendants filed their First Amended Answer and Counterclaims (the “Amended Counterclaims”) (ECF No. 34) pursuant to FRCP 15(a)(1)(A);
5. Plaintiffs’ response to the Amended Counterclaims is currently due July 12, 2024;
6. The Parties hereby stipulate and agree that Plaintiffs’ deadline to respond to the Counterclaims shall be extended by fourteen (14) days, up to and through July 26, 2024;
7. This is the first request to extend the deadline requested herein;
8. Plaintiffs contend that good cause exists for the instant extension because Plaintiffs state that they require additional time to consider and investigate the new matters raised by the Amended Counterclaims;
9. This request is made in good faith and not for the purposes of delay.

IT IS SO STIPULATED AND AGREED, by and between the undersigned counsel, that the time for Plaintiffs to respond to Defendants' Amended Counterclaim is extended to July 26, 2024.

DATED this 9th day of July 2024.

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

/s/ Zachary P. McHenry

PATRICK J. REILLY, ESQ. (NBN 6103)
100 North City Parkway, 16th Floor
Las Vegas, Nevada 89106
Tel.: (702) 382-2101 / Fax: (702) 382-8135
Email: preilly@bhfs.com

and

MARK T. OAKES, ESQ. (*pro hac vice*)
ZACHARY P. MCHENRY, ESQ. (*pro hac vice*)

ETHAN GLENN, ESQ. (*pro hac vice*)
NORTON ROSE FULBRIGHT US LLP
98 San Jacinto Boulevard, Suite 1100
Austin, Texas 78701-4255
Telephone: (512) 474-5201
Facsimile: (512) 536-4598
Email: mark.oakes@nortonrosefulbright.com
zach.mchenry@nortonrosefulbright.com
ethan.glenn@nortonrosefulbright.com

Attorneys for Defendants

DATED this 9th day of July 2024.

HOLLEY DRIGGS

/s/ Jessica M. Lujan

OLIVER J. PANCHERI, ESQ. (NBN 7476)
JESSICA M. LUJAN, ESQ. (NBN 14913)
300 South Fourth Street, Suite 1600
Las Vegas, Nevada 89101
Tel.: (702) 791-0308 / Fax: (702) 791-1912
Email: opancheri@nevadafirm.com
jlujan@nevadafirm.com

and

JEAN-PAUL CIARDULLO, ESQ. (*pro hac vice*)

FOLEY & LARDNER LLP
555 Flower Street, Suite 3300
Los Angeles, California 90071
Tel.: (213) 972-4500 / Fax: (213) 486-0065
Email: jciardullo@foley.com

and

ROBERT T. STEWART, ESQ. (NBN 13770)
FOLEY & LARDNER LLP
95 South State Street, Suite 2500
Salt Lake City, UT 84111
Tel.: (801) 401-8900
Email: rtstewart@foley.com

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

DATED July 10, 2024


UNITED STATES MAGISTRATE JUDGE